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May 21, 2025

Via ECF

**So ordered.**

The Honorable Alvin K. Hellerstein  
 United States District Court  
 Southern District of New York  
 500 Pearl Street, Room 1050  
 New York, New York 10007

/s/ Alvin K. Hellerstein, U.S.D.J.  
 5/21/25

Re: *Kashef v. BNP Paribas S.A.*, No. 16-cv-3228 (AKH)(JW)

Dear Judge Hellerstein:

This firm and Gibson Dunn & Crutcher LLP represent Defendants BNP Paribas S.A. and BNP Paribas U.S. Wholesale Holdings, Corp. (collectively, the “Defendants”) in the above-referenced action. Pursuant to Electronic Case Filing Rule 21.7(b) and Rule 4.B of the Court’s Individual Rules, together with Class Counsel, we write to request that certain materials which were filed on the public docket be sealed by the Court.

On July 21, 2023, as part of Defendants’ filing of summary judgement materials, Defendants filed certain of the Plaintiffs’ discovery documents to the public docket, namely ECF Nos. 444-25 and 444-26, Exhibits 25 and 26 to the Declaration of Charity Lee in Support of BNP Paribas S.A. and BNP Paribas US Wholesale Holdings, Corp.’s Motion for Summary Judgment, Rule 56.1 Statement of Undisputed Facts in Support of their Motion for Summary Judgment, in Opposition to Plaintiffs’ Motion for Class Certification and Daubert Motion to Exclude the Proposed Expert Testimony of Prakash Khatri (“Lee Decl.”).

ECF Nos. 444-25 and 444-26 were publicly filed in their entirety but contain personally identifying information (“PII”) including government identification numbers, and names and birthdates of spouses and children of class representatives in this action. Class Counsel notified Defendants’ counsel regarding the PII, and together called the ECF Helpdesk on May 16, 2025, to request that ECF Nos. 444-25 and 444-26 be temporarily sealed. The ECF Helpdesk did so and advised us that an email had been sent to Your Honor’s Chambers and that, pursuant to ECF Rule 21.7(b), we must ask Your Honor, in writing, for those two exhibit entries

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to be formally sealed by the Court, which Defendants and Class Counsel hereby jointly request. Defendants re-filed the corrected public redacted two exhibits (Exhibits 25 and 25 to the Lee Decl.) via errata (ECF Nos. 699, 699-1, 699-2).

Respectfully submitted,

/s/ Carmine D. Boccuzzi, Jr.

Carmine D. Boccuzzi, Jr.

cc: Counsel of Record